



World Resources Institute

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August 23, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20460

**RE: Draft Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern
Gulf of Mexico
Comments- World Resources Institute**

Dear Members of the Mississippi River/Gulf of Mexico Watershed Nutrient Taskforce:

Thank you for giving us the opportunity to make comments on the Draft Action Plan. I was pleased to see a continued emphasis on a combined voluntary, and where appropriate, regulatory approaches to meet the goals established by the Taskforce and the inclusion of greater monitoring. This will help both in our understanding of the issue itself and our success in meeting the nutrient reduction goals.

At WRI we are in the process of adapting the USMP model to address the economic and environmental impact of existing policies as well as looking at alternative policy options. Some of the additional policies we are currently considering include targeting of conservation subsidies, "greening" the farm programs, different forms of regulation, nutrient taxes, and nutrient trading. We would be happy to make any preliminary results available to the Taskforce, or perhaps use the model to analyze the impact of any additional policies that the Taskforce is considering.

I include here comments on the long-term goals as requested by the Taskforce, and a number of more specific comments relating to the document itself.

Sincerely,

Suzie Greenhalgh
Economics Program

**DRAFT PLAN OF ACTION FOR REDUCING, MITIGATING, AND CONTROLLING
HYPOXIA IN THE NORTHERN GULF OF MEXICO.**

Comments- World Resources Institute

1. Addressing Long-Term Goals

Goal 1.B is our preferred option. It provides the combination of an overall goal addressing the hypoxic problem and then an indication of what would be necessary to achieve this goal, namely a reduction in the nitrogen loads reaching the Gulf. This being numeric in nature makes the task of assessing the progress of any proposed strategy easier to ascertain.

Goal 1.A doesn't provide a suitable fallback strategy if the proposed reduction does not decrease the hypoxic zone. In contrast goal 1.B doesn't use nutrient reduction as its goal but the action to achieve the goal of a reduction in the hypoxic zone. Thus, as new information/solutions relating to hypoxia reduction become available they will still fall within the context of the overall goal.

Goal 1.C doesn't provide sufficient metrics to measure the effectiveness of reductions or an overall goal of a reduction in the hypoxic zone.

2. General comments

Enforcement mechanisms are not evident, except for those within the context of existing programs that are expected to be useful in reducing N loadings to the Gulf. What further options/mechanisms are available, or may be necessary, if the reduction in the hypoxic zone does not occur? Or if there is not increased participation in the programs currently available to help reduce nutrient loadings?

2.1 Positive points:

There are a number of points in the Action Plan that will lead to a better overall strategy to deal with the hypoxia issue. Some of these include:

- addressing the economic impact of various strategies,
- the development numeric standards to help with assessing the progress towards the nutrient/hypoxia reduction goal,
- that, in the short term, the initial steps toward the goals can be achieved within the context of existing legislation,
- there is a call for a standardization of monitoring, and
- there is a recognition that TMDL's and other similar policies are a potential part of a strategy.

2.2 Specific Comments, Questions and Suggestions:

- a) **Background**
Initial part of the document tends to down play the role of agriculture in the problem.
- b) **Implementation Actions:**
 - No mention, with the exception of #2, regarding implementation and funding for the various actions/tasks.
 - #7/8 are essential monitoring strategies but they are not implemented until the Spring of 2002, these need to be given higher priority.
- c) **Key Roles and Responsibilities**
States, Tribes, and Federal Agencies
 - municipal wastewater treatment plant obligations
 - this does not provide treatment plants with the use of other mechanisms such as trading to meet any additional reductions they may need to make. The use of trading can, in the short term, provide cost effective ways for treatment plants to meet their obligations. This is not meant to be a permanent stop gap, rather gives plants time to either raise the capital themselves, or for such activities to fall within their upgrade/maintenance schedules.
- d) **Federal Agencies (Key Roles & Responsibilities)/The framework and Approach**
It appears that the Taskforce strategies will be accomplished through existing policy. However, it seems to us that there is an excellent opportunity to bring the hypoxia issue into discussions surrounding the 2002 Farm Bill. It is also important that the action plan allows for the introduction of new policies that could be used to address the issue, such as performance based technologies which targets more directly the problem at hand.
- e) **Funding the National Effort: Clean Rivers/Clean Gulf Budget Initiative.**
It is not clear how the funds for this initiative would differ from the numerous other funding targets already in existence. Are these funds to be used as supplementary funds for these programs or as part of some new policy strategy.